



# NOLAN HELLER KAUFFMAN LLP

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April 20, 2021

**VIA ECF**

Hon. Jil Mazer-Marino, U.S.B.J.  
U.S. Bankruptcy Court, EDNY  
Conrad B. Duberstein Courthouse  
271-C Cadman Plaza East, Suite 1595  
Brooklyn, New York 11201-1800

**Re: Prime Scuba, Inc.  
Case No. 20-44415 (JMM)**

Dear Judge Mazer-Marino:

I represent KeyBank National Association, a secured creditor of the Debtor Prime Scuba, Inc. I have reviewed the recent submissions by Isaac Silberstein and Subchapter V Trustee Nat Wasserstein in advance of tomorrow's status conference. Please be advised that KeyBank is the holder of a perfected security interest in all of the Debtor's inventory, equipment and accounts, together with the products and proceeds thereof. KeyBank did *not* release its security interest in the Debtor's assets or consent to a transfer of those assets to European Outdoors, LLC.

KeyBank supports conversion of this case to a case under Chapter 7 in order to allow a Chapter 7 Trustee to continue investigating possible fraudulent and/or preferential prepetition transfers by the Debtor and/or its principals and to pursue possible Chapter 5 avoidance claims.

Very truly yours,

NOLAN HELLER KAUFFMAN LLP

A handwritten signature in blue ink, appearing to read 'Marco B. Koshykar'.

Marco B. Koshykar